

Obedin & Weissman, LLP

Attorneys at Law

GLENN A. OBEDIN
IRA R. WEISSMAN

*The Courthouse Corporate Center, Suite 4200
320 Carleton Avenue Central Islip, NY 11722*

PHONE (631) 979-7777
FAX (631) 265-5952
NOWLAW@ICLOUD.COM

June 13, 2023

*The Honorable Joan M. Azrack
United States District Judge, E.D.N.Y.
United States Courthouse
100 Federal Plaza
Central Islip, New York, 11722*

Re: U.S.A. v. Arevalo-Chavez, et.al.
Case No.: 22-CR-429 (JMA)

Dear Judge Azrack,

I am the attorney for Marlon Antonio Menjivar-Portillo, one of the defendants in the above referenced case. I also write this letter on behalf of co-counsel Steve Zissou, Sabrina Shroff, and Donald Duboulay, and their clients Walter Yovani Hernandez-Rivera, Vladimir Antonio Arevalo-Chavez, and Jose Wilfredo Ayala-Alcantara, respectively. All four defendants are currently scheduled to appear before Your Honor for a status conference on June 14, 2023. Inasmuch as the government has yet to provide any discovery, it would seem fruitless to appear for a status conference at this time. As such, all four of the defendant's consent to a continuance of the status conference until July 11, 2023, at 1:00 p.m. Additionally, it is my understanding that all four defendants have agreed to waive speedy trial time between June 14, 2023, and July 11, 2023.

It has come to all counsel's attention that our clients are being held in segregated housing at the M.D.C. This has been the case since their arrival at the facility. We would ask Your Honor to intervene so as to have our clients transferred to general population. In the meantime, we would ask that Your Honor order the M.D.C. to increase our client's phone accessibility. At present, they can only communicate with their families once a month.

I thank the Court for its assistance with this matter.

Very Truly Yours,

Glenn Obedin

GAO/js